

EXHIBIT A

DATE	PURPOSE	HOURS
10/13/2016	Met with Client to discuss case and conduct intake	3
10/14/2016	Caselaw research concerning Qualified Immunity Issues	4
10/15/2016	Visiting the Scene of the Incident and speaking with neighbors	3.3
10/15/2016	Drafting Initial Complaint	2.5
10/16/2016	Drafting Initial Complaint	.8
10/16/2016	Drafting Civil Cover Sheet	.2
10/16/2016	Drafting Proposed Summons for Defendants City of New York	.3
10/16/2016	Drafting Proposed Summons for Defendant Vaccaro	.3
10/16/2016	Drafting Proposed Summons for Defendant Muniz	
10/16/2016	Filing Initial Complaint	.1
10/16/2016	Filing Civil Cover Sheet	.1
10/16/2016	Filing Proposed Summons for Defendant City of New York	.1
10/16/2016	Filing Proposed Summons for Defendant Vaccaro	.1
10/16/2016	Filing Proposed Summons for Defendant Muniz	.1
10/17/2016	Downloaded Summons for Defendant City of New York	.1
10/17/2016	Downloaded Summons for Defendant Vaccaro	.1
10/17/2016	Downloaded Summons for Defendant Muniz	.1
10/17/2016	Forwarded Summons for Defendants to Process Server via Email	.1
10/17/2016	Reviewed Judge Koetl's Individual Rules	.3
10/18/2016	Reviewed Local Rule 83.10	.2
11/05/2016	Posted Returned Summons for Defendant City of New York to ECF	.1
11/05/2016	Posted Returned Summons for Defendant Vaccaro to ECF	.1
11/05/2016	Posted Returned Summons for Defendant Muniz to ECF	.1
12/04/2016	Email with Opposing Counsel concerning releases and a Motion to Adjourn Initial Conference	.5
12/04/2016	Reviewing Consent Letter on Motion to Adjourn Conference	.2
12/13/2016	Email to Opposing Counsel concerning 160.50 release	.1
02/20/2017	Drafting and Preparing Limited Initial Disclosures	3.5
02/21/2017	Mailing Initial Disclosures	.3
02/21/2017	Emailing Initial Disclosures	.1
02/25/2017	Reviewing Defendant's Limited Initial Disclosures	3
03/20/2017	Reviewing Defendant's Answer to Initial Complaint	.5
03/24/2017	Reviewing Email from Opposing Counsel	.1
04/14/2017	Meeting with Client	1.5
04/14/2017	Preparing HIPPA Releases for City of New York	.5
04/14/2017	Emailing Releases to Opposing Counsel	.1
05/15/2017	Email with Opposing Counsel	.3
05/16/2017	Discussion with Opposing Counsel and Review of Joint Letter to Court requesting an Initial Conference	.5
05/25/2017	Drafting First Amended Complaint	2
05/25/2017	Drafting Proposed Summons for Defendant Treubig	.2
05/25/2017	Filing FAC to ECF	.1
05/25/2017	Filing Proposed Summons for Defendant Treubig to ECF	.1
06/07/2017	Reviewed ECF Posting	.1

06/15/2017	Drafting Plaintiff's Combined First Set of Interrogatories and Requests for Production for the City of New York	1
06/15/2017	Drafting Plaintiff's Combined First Set of Interrogatories and Requests for Production from Defendants Vaccaro, Muniz and Treubig	2
06/15/2017	Drafting Notices of Deposition for Defendants Vaccaro, Muniz and Treubig	1
06/15/2017	Preparation for Appearance in Court on Behalf of Plaintiff	1
06/16/2017	Appearance in Court on Behalf of Plaintiff	.5
06/16/2017	Posted Returned Summons for Defendant Treubig	.1
06/16/2017	Emailed with Process Server	.1
06/28/2017	Reviewed Defendants' Answer to FAC	.5
06/29/2017	Reviewed Defendants' Initial Disclosures	2
06/29/2017	Reviewed Defendants' First Set of Document Requests and Interrogatories	1
06/29/2017	Email with Opposing Counsel	.1
06/31/2017	Phone Conversation with Client concerning Interrogatories	1
07/05/2017	Reviewing Correspondence with Client concerning Interrogatories	.5
07/05/2017	Drafting Plaintiff's Responses to Defendant's DRI's	3
07/07/2017	Email with Opposing Counsel	.1
07/17/2017	Email with Opposing Counsel	.1
07/24/2017	Reviewing Defendant's Second Supplemental Disclosures	2.5
07/26/2017	Reviewing Defendant's Responses and Objections to Plaintiff's DRI's	3
07/27/2017	Drafting Plaintiff's Second Amended Complaint	1
07/27/2017	Email with Opposing Counsel	.5
07/27/2017	Drafting Proposed Summons for Undercover Officer #349	.2
07/27/2017	Filing Second Amended Complaint	.1
07/27/2017	Filing Proposed Summons for UC #349	.1
07/29/2017	Downloaded Summons for UC #349 and Emailing to Process Server	.2
08/10/2017	Reviewing Answer to Second Amended Complaint	.5
08/21/2017	Posting Returned Summons for UC #349 to ECF	.1
09/02/2017	Email with Opposing Counsel	.1
09/19/2017	Preparing Plaintiff's Supplemental Responses to Defendants' DRI's	1
09/20/2017	Reviewing Plaintiff's Supplemental Responses to Defendants' DRI's	.5
09/20/2017	Email with Opposing Counsel	.1
09/29/2017	Reviewing Letter to the Court from Opposing Counsel	.2
10/02/2017	Email with Opposing Counsel	.1
10/08/2017	Phone Conversation with Client to Prepare for Deposition	1
10/11/2017	Phone Conversation with Client to Prepare for Deposition	1
10/12/2017	Appearing for Plaintiff's Deposition	4.5
10/17/2017	Reviewing Answer to SAC	.5
10/19/2017	Email with Opposing Counsel	.5
10/20/2017	Email with Opposing Counsel	.1
10/24/2017	Email with Opposing Counsel	.1
10/24/2017	Reviewing ECF Order	.1
10/25/2017	Email with Opposing Counsel	.1
10/26/2017	Deposition Preparation for Defendants Vaccaro and Muniz	5

10/27/2017	Deposition of Defendant Vaccaro	2.3
10/27/2017	Deposition of Defendant Muniz	1.3
10/30/2017	Email with Opposing Counsel	.5
11/01/2017	Email to Opposing Counsel	.3
11/01/2017	Drafting Letter concerning scheduling	.5
11/01/2017	Email with Opposing Counsel	.1
11/02/2017	Filing Letter to ECF	.1
11/06/2017	Email with Opposing Counsel	.1
11/09/2017	Email with Opposing Counsel	.3
11/09/2017	Reviewing Proposed Protective Order concerning UC #349	.4
11/13/2017	Preparation for Defendant Treubig Deposition	2.3
11/14/2017	Reviewing Defendant's Supplemental Disclosure	.5
11/14/2017	Defendant Treubig Deposition	1.5
11/15/2017	Conversation with Stephanie Griffin concerning Deposition	.2
11/16/2017	Appearance at Deposition of Stephanie Griffin	2.8
11/17/2017	Drafting and Preparing Plaintiff's Second Supplemental Disclosure	1.6
11/17/2017	Email with Opposing Counsel	.2
11/20/2017	Email with Opposing Counsel	.1
11/27/2017	Preparing for UC #349's Deposition	2.5
11/28/2017	Defendant UC #349's Deposition	1.5
11/29/2017	Email with Opposing Counsel	.2
12/11/2017	Email with Opposing Counsel	.4
12/11/2017	Reviewing Deposition Transcript of Defendant Vaccaro	2
12/12/2017	Reviewing Deposition Transcript of Defendant Muniz	1.3
12/19/2017	Email with Opposing Counsel	.9
12/20/2017	Email with Opposing Counsel	.2
12/20/2017	Hand Delivering Transcripts to Opposing Counsel	1
01/20/2018	Reviewing Deposition Transcript for UC #349	2
01/22/2018	Reviewing Deposition Transcript for Defendant Treubig	4
01/22/2018	Email with Opposing Counsel	.5
01/27/2018	Conversation with Client concerning Depositions	1
02/06/2018	Email with Opposing Counsel	.3
02/19/2018	Email with Opposing Counsel	.3
02/19/2018	Drafting Letter to the Court concerning Scheduling	.7
02/19/2018	Filing Letter to the Court concerning Scheduling	.1
02/26/2018	Drafting First Draft of Joint Pre-Trial Statement	4
02/27/2018	Drafting and Reviewing First Draft of Joint Pre-Trial Statement	1
02/27/2018	Email with Opposing Counsel	.5
02/29/2018	Reviewing ECF Letter	.2
03/02/2018	Reviewing ECF Order Resetting Deadlines	.2
03/27/2018	Email with Opposing Counsel	.1
03/29/2018	Email with Opposing Counsel	.2
03/29/2018	Reviewing ECF Order Resetting Deadlines	.2
04/02/2018	Drafting First Draft of Proposed Voir Dire Questions	6
04/03/2018	Drafting First Draft of Proposed Jury Instructions	5
04/04/2018	Drafting Second Draft of Proposed Jury Instructions	2.3

04/05/2018	Drafting Second Draft of Voir Dire Questions	1.5
04/06/2018	Reviewing and Editing Proposed Voir Dire and Jury Instructions	1
04/06/2018	Filing Proposed Voir Dire Questions	.1
04/06/2018	Filing Proposed Jury Instructions	.1
04/06/2018	Email with Opposing Counsel	.6
04/09/2018	Email with Opposing Counsel	1.3
05/09/2018	Email with Opposing Counsel	1.8
05/09/2018	Email with Opposing Counsel	.9
05/09/2018	Reviewing Case Provided by Opposing Counsel	.5
05/09/2018	Email with Opposing Counsel concerning UC #349 and Proposed Order	1.7
05/10/2018	Reviewing Defense Counsel Letter to the Court concerning UC #349	1
05/10/2018	Reviewing Subpoena for Stephanie Griffin	.2
05/10/2018	Email with Opposing Counsel	.6
05/11/2018	Reviewing Court Order	.1
05/14/2018	Drafting Writ to have Plaintiff Produced for Trial from State Custody	1.5
05/14/2018	Filing Writ to ECF	.1
05/14/2018	Reviewing Defense Motions in Limine	1
05/14/2018	Researching Issues Relevant to Defense Motions in Limine	5
05/14/2018	Email with Court and Opposing Counsel	.9
05/15/2018	Drafting Plaintiff's Response to Defense Motions in Limine	6
05/15/2018	Drafting Plaintiff's Motions in Limine	5
05/15/2018	Filing Plaintiff's Motions in Limine	.1
05/15/2018	Reviewing Plaintiff's Response to Defense Motions in Limine	.5
05/15/2018	Filing Plaintiff's Response to Defense Motions in Limine	.1
05/15/2018	Email with Opposing Counsel	.2
05/15/2018	Reviewing Defense Reply	.6
05/15/2018	Email with Opposing Counsel	.3
05/16/2018	Reviewing Court Order on Writ	.1
05/16/2018	Reviewing Transcripts and Case File in Preparation for Pre-Trial Conference	2.3
05/17/2018	Appearance on behalf of Plaintiff at Final Pre-Trial Conference	1.5
05/17/2018	Email with Opposing Counsel	1.4
05/17/2018	Email with Court and Opposing Counsel	.3
05/17/2018	Reviewing Court Order	.1
05/17/2018	Reviewing Defendants' Proposed Charge	.7
05/18/2018	Reviewing Transcripts and Case File	2
05/18/2018	Preparing Opening Statement	3.2
05/18/2018	Preparing Direct Examination	4.3
05/18/2018	Email with Opposing Counsel	.6
05/18/2018	Reviewing Court Order	.1
05/18/2018	Preparing for Opening Statement	1.5
05/19/2018	Preparing Direct Examination of Plaintiff	6
05/19/2018	Conferring with Plaintiff	1
05/19/2018	Preparing Direct Examination of Stephanie Griffin	4
05/20/2018	Preparing Cross Examination of Defendant Vaccaro	7
05/20/2018	Preparing Cross Examination of Defendant Muniz	6

05/20/2018	Preparing for Opening Statement	1
05/20/2018	Preparing Trial Binder	2
05/21/2018	Preparing for Opening Statement	1
05/21/2018	Meeting with Client	.5
05/21/2018	Appearance at Trial on behalf of Plaintiff	8
05/21/2018	Preparing for Re-Direct of Plaintiff	1.5
05/21/2018	Preparing for Cross-Examination of Defendants	6
05/22/2018	Reviewing Cross-Examination Questions	1.4
05/22/2018	Appearance at Trial on behalf of Plaintiff	8
05/22/2018	Preparing for Closing Argument	5
05/22/2018	Preparing for Charge Conference	3
05/23/2018	Preparing for Closing Argument	2
05/23/2018	Appearance at Trial on Behalf of Plaintiff	9
05/23/2018	Caselaw Research on Qualified Immunity and Post-Verdict Motions	6.4
05/23/2018	Telephone Conference with David Zelman	.5
05/24/2018	Appearance at Trial on Behalf of Plaintiff	5.5
05/24/2018	Telephone Conference with David Zelman	1
05/24/2018	Email with David Zelman	1
05/24/2018	Caselaw Research on Qualified Immunity and Post-Verdict Motions	3.6
05/25/2018	Reviewing Defense Letter to Court	1
05/29/2018	Email with David Zelman	.3
06/01/2018	Email with David Zelman	.3
06/15/2018	Email with David Zelman	.3
06/16/2018	Reviewing Defense Motion for Judgment	2.5
06/16/2018	Reviewing Relevant Caselaw	4
06/17/2018	Email with David Zelman	.4
06/18/2018	Email with David Zelman	.5
06/20/2018	Email with David Zelman	.4
06/24/2018	Email with David Zelman	.3
06/28/2018	Telephone Conversation with David Zelman	.3
06/29/2018	Telephone Conversation with David Zelman	.3
07/01/2018	Email with David Zelman	.6
07/02/2018	Email with David Zelman	.2
07/03/2018	Email with David Zelman	.4
07/04/2018	Telephone Conversation with David Zelman	.3
07/04/2018	Email with David Zelman	.2
07/09/2018	Email with David Zelman	.2
07/11/2018	Email with David Zelman	.2
07/18/2018	Reviewing Plaintiff's Opposition to Defense Motion	2
07/18/2018	Telephone Conference with David Zelman	.8
07/20/2018	Email with Opposing Counsel and David Zelman	1.4
08/02/2018	Email with Opposing Counsel and David Zelman	.3
08/14/2018	Reviewing Reply to Plaintiff's Opposition	2
11/14/2018	Email with David Zelman	.4
11/15/2018	Email with Opposing Counsel and David Zelman	.5
11/18/2018	Email with David Zelman	.4

11/19/2018	Telephone Conversation with David Zelman	1
11/21/2018	Reviewing Court's Order and Decision	4
11/21/2018	Caselaw Research	2
11/21/2018	Telephone Conversation with David Zelman	.5
11/21/2018	Telephone conversations with various colleagues	2
11/22/2018	Drafting Letter to Client Explaining Court's Order and Decision	2
11/29/2020	Reviewing Email from Amir Ali and MacArthur Justice Foundation	.2
11/29/2020	Telephone Conversation with David Zelman	.5
12/05/2018	Telephone Conversation with David Zelman	.4
12/05/2018	Email with David Zelman and Amir Ali	.1
12/06/2018	Drafting Letter to Client concerning Appellate Representation	1.2
12/11/2018	Email with David Zelman and Amir Ali	.3
12/20/2018	Reviewing Defendants' Bill of Costs	1
12/28/2018	Email with David Zelman and Amir Ali	.2
01/04/2019	Email with David Zelman and Amir Ali	.2
01/16/2019	Email with David Zelman	.2
01/25/2019	Telephone Conversation with Client and Amir Ali	.5
01/29/2019	Telephone Conversation with David Zelman	.3
02/14/2019	Email with Amir Ali	.3
02/28/2019	Email with David Zelman and Amir Ali	.4
04/15/2019	Reviewed Appellant Brief	2
04/17/2019	Email with David Zelman and Amir Ali	.2
04/26/2019	Reviewed Amicus Brief	1
07/16/2019	Reviewed Appellee Brief	2
08/12/2019	Email with David Zelman and Amir Ali	.2
09/12/2019	Reviewed Reply Brief	1
06/26/2020	Reviewed Second Circuit Decision and Order	4
06/26/2020	Telephone Conversation with David Zelman and Amir Ali	1
07/13/2020	Telephone Conversation with David Zelman and Amir Ali	.3
07/17/2020	Email with David Zelman	.2
07/18/2020	Email with David Zelman and Amir Ali	.6
07/20/2020	Telephone Conference with David Zelman and Amir Ali	1.2
08/06/2020	Appearance by Telephone on behalf of Plaintiff	.5
	Total Hours:	312
	Rate: \$500 per hour	
	Total Hourly Fee	\$156,000
Date	Costs	Amount
10/16/2016	Filing Fee	\$400
11/05/2016	Process Server Fee for City of New York, Vaccaro and Muniz	\$150
06/16/2017	Process Server Fee for Treubig	\$50
08/21/2017	Process Server Fee for UC #349	\$50
12/05/2017	Deposition Fees for Vaccaro and Muniz	\$1,176.00
12/20/2017	Deposition Fees for Treubig	\$374.15
01/04/2018	Deposition Fees for UC #349	\$362.30

	Total Costs:	\$2,562.45

EXHIBIT B